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January 22, 2025

VIA ECF

Hon. Jesse M. Furman
District Judge, U.S. District Court
Southern District of New York
40 Centre Street, Room 2202
New York, NY 10007

Re: CoEnterprise, LLC. v. Jones, Case No. 25-cv-00543

Dear Judge Furman:

Pursuant to Rule 7 of this Court's Individual Rules and Practices in Civil Cases, Plaintiff CoEnterprise, LLC ("CoEnterprise") respectfully seeks leave to file papers in support of its motion for a temporary restraining order and preliminary injunction in redacted form.

This matter involves threats by Kevin Donelson Jones ("Defendant"), CoEnterprise's former employee, to disclose misappropriated trade secrets, to disparage and defame CoEnterprise and its executives, and to interfere and otherwise do harm to CoEnterprise's valued business relationships. If the trade secrets, the methods and means of the misappropriation, or identity of the individuals and companies to whom the Defendant is threatening to disclose the trade secrets, are aired publicly, it would cause substantial risk of harm to CoEnterprise's business.

Furthermore, in an effort to interfere with CoEnterprise's business, Defendant has threatened to disparage and defame CoEnterprise and its executives by publishing damaging statements that falsely attribute to them conduct of moral turpitude, deviations from business ethics, and the commission of crimes. These threats are part of a broader effort to extort money from CoEnterprise, and airing these false, disparaging, and defamatory statements publicly would visit upon CoEnterprise and its executives the very harm that Defendant has threatened to inflict, unless he receives payment.

Accordingly, to protect CoEnterprise from further harm, CoEnterprise proposes narrowly tailored redactions to its memorandum of law and the Maresco Declaration, and exhibits thereto, insofar as such documents reference CoEnterprise's trade secrets, defendant's disparaging and

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defamatory statements, and the identities of companies and individuals to whom defendant has threatened to disclose CoEnterprise's trade secrets and publish defamatory statements. These circumstances present sufficient, compelling reasons to overcome the presumption in favor of public access to such information, and grant leave to make the limited proposed redactions.

In addition, given the personal and private nature of Defendants' threats, CoEnterprise's forthcoming motion for temporary and preliminary injunctive relief contains exhibits attached to the Maresco Declaration that contain personal information in the form of email addresses, including the email address of CoEnterprise's CEO. The privacy interests of CoEnterprise's CEO for resisting disclosure of this information outweighs the public interest in such information, as well.

We thank the Court for its time and attention to this matter and remain available should the Court require additional information.

Respectfully submitted,

/s/ Eric W. Moran

cc: Michael Gay, Esq. (via email)
Kevin Donelson Jones (via email)

Application GRANTED. The Court finds that the redactions are narrowly tailored to reasons that justify overcoming the presumption in favor of public access to judicial documents. The Clerk of Court is directed to terminate ECF No. 8.

SO ORDERED.

A handwritten signature in black ink, appearing to read 'Jesse M. Furman', is written over the 'SO ORDERED.' text.

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